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Pro Se Litigant

**IN THE UNITED STATES DISTRICT COURT
 IN AND FOR THE DISTRICT OF NEVADA**

FEI FEI FAN,
 Plaintiff,
 vs.
 YAN YAO JIANG, and
 WEI WU
 Defendant.

Case No.: 3:21-cv-00458-MMD-CSD

**Order Granting Plaintiff's Motion to
 Extend the Dispositive Motion Deadline
 Following Court-Ordered Amendment**

Plaintiff Feifei Fan respectfully moves this Court to extend the dispositive motion deadline set forth in the operative Scheduling Order (ECF No. 142), pursuant to Federal Rule of Civil Procedure 16(b)(4), following the Court's recent Order (ECF No. 227) granting leave to amend. Good cause exists to permit Plaintiff to file a dispositive motion based on the forthcoming amended complaint. In support of this motion, Plaintiff states as follows:

1. On June 24, 2025, the Court (ECF No. 227) partially granted Defendant's Rule 12(c) motion and permitted Plaintiff to amend her complaint by July 23, 2025.
2. Plaintiff is preparing the amended complaint in accordance with ECF No. 227 to address the Court-identified pleading deficiencies and clarify the scope of surviving claims.
3. The current deadline requires Plaintiff to file her motion for summary judgment twelve days before her amended complaint is due—effectively requiring Plaintiff to file her summary judgment motion before her amended complaint becomes operative.
4. While Defendant has already filed a summary judgment motion based on the current complaint (ECF No. 228), Plaintiff cannot fairly submit a corresponding motion without a short extension following amendment.

- 1 5. An extension to July 30, 2025 will allow Plaintiff to submit her motion for summary
2 judgment based on amended pleadings that reflect the Court's rulings, thereby promoting
3 procedural efficiency. This brief extension aligns with the amendment deadline (July 23)
4 and affords Plaintiff a narrow seven-day window to prepare a targeted dispositive motion
5 based on the refined claims.
- 6 6. No party will be prejudiced by this request. Discovery is complete, and Defendant has
7 already filed its dispositive motion. The requested extension is narrow, will not affect other
8 deadlines, and pertains solely to Plaintiff's ability to file her motion for summary judgment
9 after amending the complaint, as permitted by ECF No. 227.

10 WHEREFORE, Plaintiff respectfully requests that the Court extend the dispositive motion
11 deadline from July 11, 2025 to July 30, 2025, and submits a proposed order herewith.

12 Respectfully submitted,

13 Dated: July 09, 2025

Fei Fei Fan.

14 Fei Fei Fan

15 Plaintiff, Pro Se

16 **ORDER**

17 Plaintiff's Motion to Extend the Dispositive Motion Deadline is GRANTED. The deadline
18 set forth in the Scheduling Order (ECF No. 142) is extended from July 11, 2025 to July 30, 2025.

19 IT IS SO ORDERED.

20 Dated: July 11, 2025.


21 UNITED STATES DISTRICT JUDGE
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CERTIFICATE OF SERVICE

I, Fei Fei Fan, certify that on July 09, 2025, I served the following document(s):

- Plaintiff's Motion to Extend the Dispositive Motion Deadline Following Court-Ordered Amendment

on the following individuals by Electronic Filing (via CM/ECF system) indicated:

1. Courtney Miller O'Mara (Defendant's Attorney)
2. Enrique Schaerer (Defendant's Attorney)
3. Kendall M. Lovell (Defendant's Attorney)
4. MaryJo Smart Pinocchio (Defendant's Attorney)

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Respectfully submitted,

Dated: July 09, 2025

Fei Fei Fan.

Fei Fei Fan

Plaintiff, Pro Se